UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AUTHORS GUILD, DAVID BALDACCI,	
MARY BLY, MICHAEL CONNELLY, SYLVIA	
DAY, JONATHAN FRANZEN, JOHN	
GRISHAM, ELIN HILDERBRAND,	
CHRISTINA BAKER KLINE, MAYA	
SHANBHAG LANG, VICTOR LAVALLE,	ECF CASE
GEORGE R.R. MARTIN, JODI PICOULT,	
DOUGLAS PRESTON, ROXANA ROBINSON,	No. 1:23-cv-08292-SHS
GEORGE SAUNDERS, SCOTT TUROW, and	
RACHEL VAIL, individually and on behalf of	
others similarly situated,	
Plaintiffs,	
v.	
OPEN AI INC., OPENAI OPCO LLC, OPENAI	
GP LLC, OPENAI, LLC, OPENAI GLOBAL	
LLC, OAI CORPORATION LLC, OPENAI	
HOLDINGS LLC, OPENAI STARTUP FUND I	
LP, OPENAI STARTUP FUND GP I LLC,	
OPENAI STARTUP FUND MANAGEMENT	
LLC, and MICROSOFT CORPORATION,	
Defendants.	
JONATHAN ALTER, KAI BIRD, TAYLOR	
BRANCH, RICH COHEN, EUGENE LINDEN,	
DANIEL OKRENT, JULIAN SANCTON,	
HAMPTON SIDES, STACY SCHIFF, JAMES	
SHAPIRO, JIA TOLENTINO, and SIMON	
WINCHESTER, on behalf of themselves and all	
others similarly situated,	ECF CASE
Plaintiffs,	
V.	No. 1:23-cv-10211-SHS
OPEN AI INC., OPENAI OPCO LLC, OPENAI	
GP LLC, OPENAI, LLC, OPENAI GLOBAL	
LLC, OAI CORPORATION LLC, OPENAI	
HOLDINGS LLC, OPENAI STARTUP FUND I	
LP, OPENAI STARTUP FUND GP I LLC,	
OPENAI STARTUP FUND MANAGEMENT	
LLC, and MICROSOFT CORPORATION,	
Defendants	

AFFIDAVIT OF ROSE S. LEE IN SUPPORT OF MOTION TO ADMIT COUNSEL $\ensuremath{\textit{PRO HAC VICE}}$

- I, Rose S. Lee, being duly sworn deposes and says as follows:
- 1. I am a Partner at the law firm of Morrison & Foerster LLP.
- 2. I submit this declaration in support of the motion for my admission *pro hac vice* in the above-captioned matter.
- 3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.
 - 4. I have never been convicted of a felony.
- 5. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
 - 6. There are no pending disciplinary proceedings in any state or federal court.
- 7. I respectfully request admission *pro hac vice* to appear as counsel in this matter for defendants OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC
- 8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 29, 2024 Palo Alto, California

By:

Rose S. Lee

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA

COUNTY OF SANTA CLARA



(Seal)

Subscribed and sworn to (or affirmed) before me on this <u>29th</u> day of February, 2024, by <u>Rose S. Lee</u> proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Notary Public